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15 **UNITED STATES DISTRICT COURT**
16 **DISTRICT OF NEVADA**

17 ALAMA ROBINSON,

18 Plaintiff,

19 vs.

20 WESTINGHOUSE AIR BRAKE
21 TECHNOLOGIES CORPORATION,
22 a Delaware corporation; WABTEC
CORPORATION, a Pennsylvania corporation;
and DOES I-20, inclusive,

23 Defendants.

Civil Action No. 3:09-CV-00202-LRH-RAM

Electronic Filing

DEFENDANT'S CORRECTED CONSENT
MOTION FOR EXTENSION OF TIME
TO ANSWER OR OTHERWISE
RESPOND TO THE COMPLAINT
(FIRST REQUEST)
AND ORDER

24
25 Defendant Westinghouse Air Brake Technologies Corporation and/or WABTEC
26 Corporation hereby request a 20-day extension to answer or otherwise respond to Plaintiff's
27 Complaint. In support thereof, Defendant states as follows:

28 1. Plaintiff filed his Complaint in the above-captioned action on April 20,

1 2009.

2 2. Plaintiff served his Complaint on Defendant on August 12, 2009.
3 Accordingly, Defendant's answer or other response to the Complaint is due on September 1,
4 2009.

5 3. Due to the requirements of other business, Defendant requests a 20 day
6 extension to answer or otherwise respond to Plaintiff's Complaint. Accordingly, Defendant's
7 answer or other response would be due on September 21, 2009.

8 4. In a telephone voicemail on August 28, 2009, Plaintiff's counsel
9 consented to Defendant's request for a 20-day extension.

10 5. No prejudice will result to either party by the grant of this Motion.

11 WHEREFORE, Defendant respectfully requests that its Consent Motion for
12 Extension of Time to Answer or Otherwise Respond to Plaintiff's Complaint be granted and that
13 Defendant be given until September 21, 2009 to provide an answer or other response to the
14 Complaint.

15 RESPECTFULLY SUBMITTED this 15th day of SEPTEMBER, 2009

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21 Pittsburgh, PA 15222
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28 By: Brian A. Gonsalves
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 Of-Counsel to Curiale Hirschfeld Kraemer LLP
 and Attorneys for Defendant

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2 IT IS SO ORDERED this 2nd day of September, 2009.
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LARRY R. HICKS
UNITED STATES DISTRICT JUDGE